

NASA Interim Directive (NID): NASA Paperwork Reduction Act (PRA) Compliance Program

Responsible Office: NASA Office of the Chief Information Officer

1. POLICY

It is NASA policy to:

- a. Establish and maintain a NASA Paperwork Reduction Act (PRA) Compliance Program that ensures information collected by NASA from members of the public satisfies a programmatic need and minimizes the burden imposed on the public to the greatest extent practicable in accordance with the PRA of 1995. The PRA identifies members of the public as an individual, partnership, association, corporation, business trust, or legal representative, an organized group of individuals, a State, territorial, tribal, or local government or branch thereof, or a political subdivision, and federal contractors. The PRA further identifies the unique circumstances where federal employees may be considered ‘members of the public’ when the information collected triggers the PRA and will be used for statistical purposes.
- b. Obtain approval from OMB, in the form of a “control number”, through the Agency PRA Clearance Officer before imposing an information collection burden on ten or more members of the public covered by the PRA; using identical questions, whether the information collection is mandatory, required for a benefit, or voluntary, and regardless of the form or format.
- c. Ensure information collections conducted or sponsored by NASA that trigger the PRA display the required PRA statement (See Attachment C).
- d. Publish Federal Register Notices (FRNs) to enable the public to comment on NASA’s intent to establish, change, extend, and reinstate an information collection covered by the PRA, in accordance with NPD 1400.2, Publishing NASA Documents in the Federal Register and Responding to Regulatory Actions.
- e. Use, to the maximum extent practicable, information technology to reduce the burden on the public who respond to NASA conducted/sponsored information collections and improve data quality, Agency efficiency, and responsiveness to the public in accordance with the Paperwork Elimination Act, 44 U.S.C. § 3504.
- f. Promote flexible and open interaction with the public by ensuring NASA’s use of social media and web-based interactive technologies comply with the PRA and other Federal laws, related policies, procedures, standards, and memoranda and guidelines (e.g., April 2010 White House Memorandum on Social Media, Web-Based Interactive Technology.)
- g. Ensure the creation, collection, maintenance, use, dissemination, and disposition of NASA conducted/sponsored information collections covered by the PRA is consistent with NASA Procedural

Requirement (NPR) 1382.1, NASA Privacy Procedural Requirements, NPR 1600.1, NASA Security Program Procedural Requirements, and NPR 1441.1, NASA Records Retention Schedules.

h. Report NASA PRA burden reduction initiatives and information collection violations to OMB in accordance with 5 CFR 1320, Controlling Paperwork Burdens on the Public.

i. Establish a training module through the System for Administration, Training, and Educational Resources for NASA (SATERN) to promote awareness of the NASA PRA program and compliance with the PRA.

2. APPLICABILITY

a. This NASA Interim Directive (NID) applies to NASA Headquarters and Centers, including Component Facilities and all technical service support Centers. This directive applies to the Jet Propulsion Laboratory (JPL) and contractors, grantees, and cooperative agreement awardees who collect information on behalf of the government to the extent specified or referenced in the contract/agreement and, as it relates to a role that is identified in this directive.

b. In this directive, all mandatory actions (i.e., requirements) are denoted by statements containing the term “shall.” The terms: “may” or “can” denote discretionary privilege or permission, “should” denotes a good practice and is recommended, but not required, “will” denotes expected outcome, and “are/is” denotes descriptive material.

c. In this directive, the terms “instrument/form/web form/survey/focus group facilitator scripts” are used interchangeably.

d. In this directive, all document citations are assumed to be the latest version unless otherwise noted.

3. AUTHORITY

a. National Aeronautics and Space Act of 1958, 51 United States Code (U.S.C.) § 20101 et.seq.

b. Paperwork Reduction Act of 1995, 44 U.S.C. § 3501, as amended.

c. Government Paperwork Elimination Act, 44 U.S.C. § 3504

d. Controlling Paperwork Burdens on the Public Office of Management and Budget, 5 Code of Federal Regulations (CFR) 1320

4. APPLICABLE DOCUMENTS AND FORMS

a. Agency Certification for Proposed Collections of Information. 5 CFR 1320.9

b. Plain Writing Act of 2010, P.L. 111-274

c. OMB Memorandum, Facilitating Scientific Research by Streamlining the Paperwork Reduction Act, 12/09/2010

d. OMB Final Guidance for the Plain Writing Act of 2010

- e. OMB Guidance on the Use of Challenges and Prizes to Promote Open Government, 03/08/2010
- f. OMB Guidance on Web-based Interactive Technologies: Data Search Tools, Calculators, and the Paperwork Reduction Act, 09/05/2014
- g. White House Memorandum, Paperwork Reduction Act – Generic Clearances, 05/28/2010
- h. White House Memorandum On Social Media, Web Based Interactive Technologies, and the Paperwork Reduction Act, 04/07/2010
- i. White House Memorandum, Testing and Simplifying Federal Forms, 09/09/2012
- j. NPD 1400.2, Publishing NASA Documents in the Federal Register and Responding to Regulatory Actions
- k. NPR 1382.1A, NASA Privacy Procedural Requirements
- l. NPR 1441.1, NASA Records Retention Schedules
- m. NPR 1600.1, NASA Security Program Procedural Requirements

5. RESPONSIBILITY

- a. The NASA Chief Information Officer (CIO) shall:

(1) Serve as the Senior NASA Official for the PRA Compliance Program, establishing the overall strategic goals and policies to manage and control information collected from members of the public who are covered by the Paperwork Reduction Act of 1995. This authority includes authorizing the cancellation/removal of active information collection instruments that are non-compliant with the PRA.

(2) Designate an Agency PRA Clearance Officer to manage the NASA PRA Compliance Program.

b. Officials-in-Charge of Headquarters (HQ) Offices and Center Directors shall ensure information collections conducted or sponsored by NASA that trigger the PRA are developed by an office that has planned and allocated resources for the efficient and effective use of information to be collected, including the processing of the information in a manner that shall enhance, where appropriate, the practical utility of the information to NASA and to the public in accordance with 5 C.F.R. 1320.9(h).

- c. The Director of HQ Operations and NASA Center Directors shall appoint a Center Paperwork Reduction Act (PRA) Clearance Coordinator (aligned to the Center CIO) who shall:

(1) Serve as a liaison between Center program/project offices and the Agency PRA Clearance Officer.

(2) Provide guidance in the establishment of new information collections, the renewal of expiring information collections, the formal cancellation of information collections no longer needed, and ensure Center conducted or sponsored information collections that trigger the PRA are processed through the Agency PRA Clearance Officer.

(3) Establish Center PRA policy, as applicable, in accordance with governing statutes, regulations, policies, and procedures.

d. The NASA PRA Program Clearance Officer shall:

- (1) Provide overall management and control of the PRA Program, including management of the PRA process.
- (2) Develop and maintain Agency-wide policy, procedures, and guidance to effectively manage the NASA PRA Program.
- (3) Serve as the authorized liaison between NASA and the OMB/Office of Regulatory Affairs (OIRA) regarding NASA information collections covered by the PRA.
- (4) Process NASA information collection requests through OMB/OIRA and certify, on behalf of the CIO, that each information collection submitted complies with 5 CFR 1320.9, Agency Certification for Proposed Collections of Information.
- (5) Collaborate with the NASA Federal Register Liaison to publish federal register notices (FRNs) to enable members of the public review and comment on NASA's intent to create, revise, extend, and reinstate information collections in accordance with NPD 1400.2, Publishing NASA Documents in the Federal Register and Responding to Regulatory Actions.
- (6) Provide guidance to Center PRA Clearance Coordinators and individuals who conduct/sponsor NASA information collections covered by the PRA in accordance with NASA and OMB/OIRA processes.
- (7) Team with the NASA Shared Services Center to establish and maintain a training module to promote Agency-wide awareness and compliance.
- (8) Report NASA burden reduction accomplishments, initiatives, and information collection violations with mitigation strategies to OMB as required.
- (9) Collaborate with the NASA Privacy Program Officer to ensure a PRA applicability review is incorporated into the Initial Privacy Threshold Analysis (IPTA) and the Privacy Impact Assessment in accordance with NPR 1382.1A, NASA Privacy Procedural Requirements.
- (10) Manage PRA related content within the Privacy and Controlled Unclassified Information Assessment Tool (PCAT).

e. NASA offices conducting or sponsoring information collections subject to the PRA shall:

- (1) Ensure procurement request originators and project managers address the requirements of this NID and other applicable statutory and regulatory requirements involving grants, cooperative agreements, contract specifications and statements of work when NASA:
 - (a) Requires a contractor, grantee, or cooperative agreement awardee to collect information from members of the public, on the Agency's behalf/sponsored by NASA, that trigger the PRA.
 - (b) Has significant input/control in the design, methodology, and analysis of information collections, surveys, and evaluations.

(2) Collaborate with the Agency PRA Clearance Officer, through the Center PRA Clearance Coordinator, to prepare documentation for OMB approval to collect information from members of the public when the PRA is triggered, to include:

(a) drafting the necessary FRNs,

(b) preparing the required OMB supporting statement,

(c) ensuring the information collection instrument(s) is written in plain, coherent, unambiguous language that is understandable to respondents per the Plain Writing Act of 2010, P.L. 111-274 and OMB Final Guidance for the Plain Writing Act of 2010, and

(d) completing the Sponsor Certification (see Attachment D.)

(3) Consider all public comments received in response to published FRNs and effect changes to information collection strategies and/or instruments, as applicable. Forward dispositioned comments, through the Center PRA Clearance Coordinator, to the Agency PRA Clearance Officer, who will release the official NASA response to the original submitter.

(4) Evaluate the applicability of the PRA to NASA information collections per OMB Guidance:

(a) March 8, 2010, Guidance on the Use of Challenges and Prizes to Promote Open Government,

(b) April 7, 2010 OMB Memorandum, Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act, and

(c) September 5, 2014, Web-based Interactive Technologies: Data Search Tools, Calculators, and the Paperwork Reduction Act.

(5) Ensure each OMB approved information collection instrument/form etc., sponsored by NASA, displays the required PRA statement to include but not limited to the unique OMB control number and the associated expiration date.

(6) Understand when and how the PRA applies in the context of scientific research as described in the OMB December 9, 2010 Memorandum, Facilitating Scientific Research by Streamlining the Paperwork Reduction Act Process.

(7) Collaborate with the Center PRA Clearance Coordinator and the Agency PRA Clearance Officer to

(a) Effect any change to an active OMB approved information collection instrument to include but not limited to information collection title changes, affected public scope changes, form/instrument changes, annual burden hours increases or decreases, changes to the designated point of contact of record, and plans to renew/reinstate or cancel OMB approved information collections.

(b) Initiate the process to:

(i) Extend an OMB approved information collection no less than eight months before the scheduled expiration date (See Attachment E.)

(ii) Cancel or discontinue approved information collections no less than two months after they are no longer needed, and at least two months before the scheduled expiration date.

(c) Use the NASA Generic Clearance Process/OMB Short Form to test new and/or substantially revised information collection instruments for clarity and comprehensibility in accordance with the 09/09/2012 White House Memorandum, Testing and Simplifying Federal Forms, and collect feedback to improve existing or future service delivery from customers and stakeholders who trigger the PRA in accordance with the 05/28/2010 White House Memorandum, Paperwork Reduction Act – Generic Clearances (See Attachment F.)

(8) Report all active information collection instruments subject to the PRA that do not have OMB approval to both the Center PRA Clearance Coordinator and the Agency PRA Clearance Officer and take steps to bring the information collection into compliance with the PRA. If the applicable information collection instrument and/or form(s) is immediately cancelled by the sponsoring office and is no longer required, report as a mitigated violation.

f. Web Masters, Web Curators, NASA and Center Forms Manager, Forms Designers, Information System Owners, Graphics Coordinators, Graphic Designers, and Printing Managers shall:

(1) Ensure NASA information collection initiators and sponsors present a completed Sponsor Authorization before deploying/posting/printing information collection instruments (forms/Web forms, surveys, questionnaires, etc.) that trigger the PRA and document this compliance in the appropriate compliance validation tool (e.g. System for Tracking and Registering Applications and Web Sites (STRAW) for web sites, NASA Electronic Forms Systems (NEFS) for forms). (See Attachment G)

(2) Ensure forms, surveys, and other instruments used to collect information for NASA through members of the public covered by the PRA display the authorized PRA statement prior to release/deployment and document this compliance in the appropriate compliance validation tool (e.g. System for Tracking and Registering Applications and Web Sites (STRAW) for web sites, NASA Electronic Forms Systems (NEFS) for forms)..

(3) Remove information collection instruments in accordance with the expiration date noted in the applicable PRA statement.

6. MEASUREMENTS

- 1) The Agency PRA Clearance Officer, in collaboration with Center PRA Clearance Coordinator and designated sponsors of approved information collections (ICs) shall respond to OMB/OIRA data calls to review ICs for burden reduction initiatives and report PRA violations.
- 2) The designated point of contact for NASA conducted/sponsored information collections shall notify the Agency PRA Clearance Officer and the Center PRA Clearance Coordinator of the intent to renew OMB/OIRA approved information collections no less than eight (8) months in advance of the expiration date established by OMB/OIRA, and cancel or discontinue information collections no less than two months after they are no longer needed.

ATTACHMENT A: Definitions

TERM	DEFINITION	SOURCE DOCUMENT
Agency	<p><i>Agency</i> means any executive department, military department, Government corporation, Government controlled corporation, or other establishment in the executive branch of the government, or any independent regulatory agency.</p> <p>The term <i>Agency</i>, <i>does not</i> include:</p> <p>(1) The General Accounting Office;</p> <p>(2) Federal Election Commission;</p> <p>(3) The governments of the District of Columbia and the territories and possessions of the United States, and their various subdivisions; or</p> <p>(4) Government-owned contractor-operated facilities, including laboratories engaged in national defense research and production activities.</p>	5CFR, Part 1320.1 as of 07/02/2015
Burden	<p><i>Burden</i> means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency, including:</p> <p>(i) Reviewing instructions;</p> <p>(ii) Developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information;</p> <p>(iii) Developing, acquiring, installing, and utilizing technology and systems for the purpose of processing and maintaining information;</p> <p>(iv) Developing, acquiring, installing, and utilizing technology and systems for the purpose of disclosing and providing information;</p>	5CFR, Part 1320.1 as of 07/02/2015

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	<p>(v) Adjusting the existing ways to comply with any previously applicable instructions and requirements;</p> <p>(vi) Training personnel to be able to respond to a collection of information;</p> <p>(vii) Searching data sources;</p> <p>(viii) Completing and reviewing the collection of information; and</p> <p>(ix) Transmitting, or otherwise disclosing the information.</p> <p>(2) The time, effort, and financial resources necessary to comply with a collection of information that would be incurred by persons in the normal course of their activities (e.g., in compiling and maintaining business records) will be excluded from the “burden” if the agency demonstrates that the reporting, recordkeeping, or disclosure activities needed to comply are usual and customary.</p> <p>(3) A collection of information conducted or sponsored by a Federal agency that is also conducted or sponsored by a unit of State, local, or tribal government is presumed to impose a Federal burden except to the extent that the agency shows that such State, local, or tribal requirement would be imposed even in the absence of a Federal requirement.</p>	
Collection of Information	<p>The obtaining, causing to be obtained, soliciting, or requiring the disclosure to an agency, third parties or the public of information by or for an agency by means of identical questions posed to, or identical reporting, recordkeeping, or disclosure requirements imposed on, ten or more persons, whether such collection of information is mandatory, voluntary, or required to obtain or retain a benefit. “Collection of information” includes any requirement or request for persons to obtain, maintain, retain, report, or publicly disclose information. As used in this Part, “collection of information” refers to the act of collecting or disclosing information, to the information to be collected or disclosed, to a plan and/or an instrument calling for the collection or disclosure of information, or any of these, as appropriate.</p> <p>(1) A “collection of information” may be in any form or format, including the use of report forms; application forms; schedules; questionnaires; surveys; reporting or recordkeeping requirements;</p>	5CFR, Part 1320.1 as of 07/02/2015

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	<p>contracts; agreements; policy statements; plans; rules or regulations; planning requirements; circulars; directives; instructions; bulletins; requests for proposal or other procurement requirements; interview guides; oral communications; posting, notification, labeling, or similar disclosure requirements; telegraphic or telephonic requests; automated, electronic, mechanical, or other technological collection techniques; standard questionnaires used to monitor compliance with agency requirements; or any other techniques or technological methods used to monitor compliance with agency requirements. A “collection of information” may implicitly or explicitly include related collection of information requirements.</p> <p>(2) Requirements by an agency for a person to obtain or compile information for the purpose of disclosure to members of the public or the public at large, through posting, notification, labeling or similar disclosure requirements constitute the “collection of information” whenever the same requirement to obtain or compile information would be a “collection of information” if the information were directly provided to the agency. The public disclosure of information originally supplied by the Federal government to the recipient for the purpose of disclosure to the public is not included within this definition.</p> <p>(3) “Collection of information” includes questions posed to agencies, instrumentalities, or employees of the United States, if the results are to be used for general statistical purposes, that is, if the results are to be used for statistical compilations of general public interest, including compilations showing the status or implementation of Federal activities and programs.</p> <p>(4) As used in paragraph (c) of this section, “ten or more persons” refers to the persons to whom a collection of information is addressed by the agency within any 12-month period, and to any independent entities to which the initial addressee may reasonably be expected to transmit the collection of information during that period, including independent State, territorial, tribal or local entities and separately incorporated subsidiaries or affiliates. For the purposes of this definition of “ten or more persons,” “persons” does not include employees of the respondent acting within the scope of their employment, contractors engaged by a respondent for the purpose of complying with the collection of information, or current employees of the Federal government (including military reservists and members of</p>	

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	<p>the National Guard while on active duty) when acting within the scope of their employment, but it does include retired and other former Federal employees.</p> <p>(i) Any recordkeeping, reporting, or disclosure requirement contained in a rule of general applicability is deemed to involve ten or more persons.</p> <p>(ii) Any collection of information addressed to all or a substantial majority of an industry is presumed to involve ten or more persons.</p> <p>Information” does not generally include items in the following categories; however, OMB may determine that any specific item constitutes “information”:</p> <p>(1) Affidavits, oaths, affirmations, certifications, receipts, changes of address, consents, or acknowledgments; provided that they entail no burden other than that necessary to identify the respondent, the date, the respondent's address, and the nature of the instrument (by contrast, a certification would likely involve the collection of “information” if an agency conducted or sponsored it as a substitute for a collection of information to collect evidence of, or to monitor, compliance with regulatory standards, because such a certification would generally entail burden in addition to that necessary to identify the respondent, the date, the respondent's address, and the nature of the instrument);</p> <p>(2) Samples of products or of any other physical objects;</p> <p>(3) Facts or opinions obtained through direct observation by an employee or agent of the sponsoring agency or through non-standardized oral communication in connection with such direct observations;</p> <p>(4) Facts or opinions submitted in response to general solicitations of comments from the public, published in the FEDERAL REGISTER or other publications, regardless of the form or format thereof, provided that no person is required to supply specific information pertaining to</p>	

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	<p>the commenter, other than that necessary for self-identification, as a condition of the agency's full consideration of the comment;</p> <p>(5) Facts or opinions obtained initially or in follow-on requests, from individuals (including individuals in control groups) under treatment or clinical examination in connection with research on or prophylaxis to prevent a clinical disorder, direct treatment of that disorder, or the interpretation of biological analyses of body fluids, tissues, or other specimens, or the identification or classification of such specimens;</p> <p>(6) A request for facts or opinions addressed to a single person;</p> <p>(7) Examinations designed to test the aptitude, abilities, or knowledge of the persons tested and the collection of information for identification or classification in connection with such examinations;</p> <p>(8) Facts or opinions obtained or solicited at or in connection with public hearings or meetings;</p> <p>(9) Facts or opinions obtained or solicited through non-standardized follow-up questions designed to clarify responses to approved collections of information; and</p> <p>(10) Like items so designated by OMB.</p>	
Conduct or Sponsor an Information Collection	<p>A Federal agency is considered to “conduct or sponsor” a collection of information if the agency collects the information, causes another agency to collect the information, contracts or enters into a cooperative agreement with a person to collect the information, or requires a person to provide information to another person, or in similar ways causes another agency, contractor, partner in a cooperative agreement, or person to obtain, solicit, or require the disclosure to third parties or the public of information by or for an agency. A collection of information undertaken by a recipient of a Federal grant is considered to be “conducted or sponsored” by an agency only if:</p> <p>(1) The recipient of a grant is conducting the collection of information at the specific request of the agency; or</p>	5CFR, Part 1320.1 as of 07/02/2015

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	<p>(2) The terms and conditions of the grant require specific approval by the agency of the collection of information or collection procedures.</p> <p>NOTE: Federally funded investigator-initiated grants are generally not subject to OMB review under the PRA, as those grantee-conducted collections have not been specifically requested by the agency and do not require the agency's specific approval. For example, the National Science Foundation (NSF) has many program areas that support investigator-initiated basic research on a wide array of topics. Although NSF panels review the proposals and although NSF funds the research, NSF does not specifically request the information collection or approve the collection of the collection procedures. As a result, such information collections are not subject to the PRA.</p>	(Source for note: OMB Memorandum M-11-07, December 9, 2010)
Members of the Public	See the definition for 'person' below.	
OMB Control Number	<p>Two four-digit codes separated by a hyphen. The first four digits identify the sponsoring agency and bureau, and the second four digits identify the particular collection. (Approved information collections with OMB control numbers are available online at http://www.reginfo.gov)</p> <p>NOTE: OMB assigns the OMB control number. OMB control numbers always have an expiration date.</p>	OMB Memo April 7, 2010 "Information Collection Under the PRA (page 2 foot note #7)
Person	<p>An individual, partnership, association, corporation (including operations of government-owned contractor-operated facilities), business trust, or legal representative, an organized group of individuals, a State, territorial, tribal, or local government or branch thereof, or a political subdivision of a State, territory, tribal, or local government or a branch of a political subdivision;</p> <p>“Ten or more persons” refers to the persons to whom a collection of information is addressed by the agency within any 12-month period, and to any independent entities to which the initial addressee may reasonably be expected to transmit the collection of information during</p>	5CFR, Part 1320.1 as of 07/02/2015

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	<p>that period, including independent State, territorial, tribal or local entities and separately incorporated subsidiaries or affiliates. For the purposes of this definition of “ten or more persons,” “persons” does not include employees of the respondent acting within the scope of their employment, contractors engaged by a respondent for the purpose of complying with the collection of information, or current employees of the Federal government (including military reservists and members of the National Guard while on active duty) when acting within the scope of their employment, but it does include retired and other former Federal employees.</p> <p><i>44 U.S.C. § 3502(10). 6</i> <i>For the purpose of counting the number of respondents, agencies should consider the number of respondents within any 12 month period. If a collection of information is addressed to all or a substantial</i></p> <p>“</p>	<p>OMB 2014 Information Collection Budget, Chapter 2</p> <p>OMB Meme April 7, 2010 “Information Collection Under the PRA “ 44 U.S.C. § 3502(3)(A)(i). (page 2 footnote #12)</p>
Paperwork Reduction Act Statement	<p>In the case of forms, questionnaires, instructions, and other written collections of information sent or made available to potential respondents (other than in an electronic format), place the currently valid OMB control number with the expiration date on the front page of the collection of information;</p> <p>In the case of forms, questionnaires, instructions, and other written collections of information sent or made available to potential respondents in an electronic format, to place the currently valid OMB control number in the instructions, near the title of the electronic collection instrument, or, for on-line applications, on the first screen viewed by the respondent;</p> <p><i>NOTE: It is also NASA policy to display the NASA PRA Statement on the information collection instrument unless an exception is requested through the NASA PRA Clearance Officer and granted via the OMB</i></p>	

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	<p><i>Desk Officer assigned to NASA. The NASA PRA Statement is provided below:</i></p> <p>Paperwork Reduction Act Statement - This information collection meets the requirements of 44 U.S.C. § 3507, as amended by section 2 of the Paperwork Reduction Act of 1995. You do not need to answer these questions unless we display a valid Office of Management and Budget control number. The OMB control number for this information collection is 2700-XXXX and it expires on mm/dd/yyyy. We estimate that it will take about X minutes to read the instructions, gather the facts, and answer the questions. You may send comments on our time estimate above to: (insert an email address or mailing address) Send only comments relating to our time estimate to this address.</p>	
Practical Utility	<p>The actual, not merely the theoretical or potential, usefulness of information to or for an agency, taking into account its accuracy, validity, adequacy, and reliability, and the agency's ability to process the information it collects (or a person's ability to receive and process that which is disclosed, in the case of a third-party or public disclosure) in a useful and timely fashion. In determining whether information will have “practical utility,” OMB will take into account whether the agency demonstrates actual timely use for the information either to carry out its functions or make it available to third-parties or the public, either directly or by means of a third-party or public posting, notification, labeling, or similar disclosure requirement, for the use of persons who have an interest in entities or transactions over which the agency has jurisdiction. In the case of recordkeeping requirements or general purpose statistics (see §1320.3(c)(3)), “practical utility” means that actual uses can be demonstrated.</p>	5CFR, Part 1320.1 as of 07/02/2015
Violation	<p>OMB reports two categories of violations of the Paperwork Reduction Act: (1) collections in use without OMB approval and (2) lapses in renewal or discontinuation. Violations falling under the first category, collections in use without OMB approval, occur when the agency fails</p>	OMB 2014 Information Collection

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	<p>to submit the information collection request to OMB before it begins to collect information. Violations falling under the second category, lapses in renewal or discontinuation, occur when the agency fails to submit its request to OMB to renew or discontinue its approval for a collection prior to the expiration date.</p> <p>Although both categories are violations of the PRA, OMB considers the number of lapses in renewal or discontinuation to be the better indicator of effective agency management of PRA. A high number of agency collections in use without OMB approval could indicate that the agency is effectively identifying violations and bringing them into compliance. On the other hand, a high number of lapses in renewal or discontinuation could indicate that the agency should improve its process for submitting renewals or discontinuations. Therefore, without understating the seriousness of collections in use without OMB approval, OMB uses only violations due to lapses in renewal or discontinuation as the strongest way to measure individual agency compliance with the PRA. OMB uses both categories to measure total violations for the entire Federal government.</p>	Budget, Chapter 2, page 10.

ATTACHMENT B: Acronyms

CFR	Code of Federal Regulations
CIO	Chief Information Officer
FRN	Federal Register Notice
HQ	Headquarters
IC	Information Collection
IPTA	Initial Privacy Threshold Analysis
JPL	Jet Propulsion Laboratory
NASA	National Aeronautics and Space Administration
NEFS	NASA Electronic Forms Systems
NID	NASA Interim Directive
NPD	NASA Policy Directive
NPR	NASA Procedural Requirement
OIRA	OMB Office of Information and Regulatory Affairs
OMB	Office of Management and Budget
PCAT	Privacy and Controlled Unclassified Information Assessment Tool
PRA	Paperwork Reduction Act
SATERN	System for Administration, Training, and Educational Resources for NASA
STRAW	System for Tracking and Registering Applications and Web Sites
U.S.C.	United States Code

ATTACHMENT C: Official PRA Statement Format for NASA Approved Information Collections.

The OMB authorized NASA PRA statement format is provided below. The PRA Statement is positioned on the last page of the information collection instrument:

Paperwork Reduction Act Statement

This information collection meets the requirements of 44 U.S.C § 3507 as amended by section 2 of the Paperwork Reduction Act of 1995. You do not need to answer these questions unless we display a valid Office of Management and Budget (OMB) control number. The OMB control number for this collection is 2700-XXXX and this information collection expires on MM/DD/YYYY. We estimate that it will take XX minutes/hours to read the instructions, gather the facts, and answer the questions. Send only comments relating to our time estimate to: (insert an electronic response option such as an email address whenever possible.)

(NOTE: An OMB Control Number is a unique number comprised of two four-digit codes separated by a hyphen. The first four-digit code identifies the agency and the second four digits identify the unique information collection number assigned by OMB. The identifying four-digit code for NASA is 2700. The federal inventory of approved collections, with OMB Control Numbers can be found at www.Reginfo.gov)

ATTACHMENT D: Information Collection Certification for Proposed Collections of Information

NASA INFORMATION COLLECTION CERTIFICATION

This information collection is: _____ conducted by NASA _____ sponsored by NASA.
Title of Information Collection _____

The proposed collection of information –

(a) is necessary for the proper performance of the functions of NASA, including that the information to be collected will have practical utility;

(b) is not unnecessarily duplicative of information that is reasonably accessible to the agency;

(c) reduces to the extent practicable and appropriate the burden on persons who shall provide information to or for the agency, including with respect to small entities, as defined in the Regulatory Flexibility Act (5 U.S.C. 601(6)), the use of such techniques as:

(1) establishing differing compliance or reporting requirements or timelines that take into account the resources available to those who are to respond;

(2) the clarification, consolidation, or simplification of compliance and reporting requirements; or

(3) an exemption from coverage of the collection of information, or any part thereof;

(d) is written using plain, coherent, and unambiguous terminology and is understandable to those who are targeted to respond;

(e) indicates for each recordkeeping requirement the length of time persons are required to maintain the records specified;

(f) has been developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected, including the processing of the information in a manner which shall enhance, where appropriate, the utility of the information to agencies and the public;

(g) when applicable, uses effective and efficient statistical survey methodology appropriate to the purpose for which the information is to be collected; and

(h) to the maximum extent practicable, uses appropriate information technology to reduce burden and improve data quality, agency efficiency and responsiveness to the public; and

(i) will display the required PRA statement with the active OMB control number, as validated on www.reginfo.gov

IC Sponsor Printed Name, Signature, and Date

Telephone Number: (area code) _____ Email _____

Printed Center PRA Clearance Coordinator Name, Signature, Date _____

Agency PRA Clearance Officer Name, Signature, Date _____

**NOTE: The term 'conducts' an information collection is applicable when NASA collects the information for itself, using its own staff and resources. The term 'sponsors' a collection is used when NASA (A) causes another federal agency to collect the information, or (B) contracts or enters into a cooperative agreement to collect the information.*

Attachment D (additional guidance):

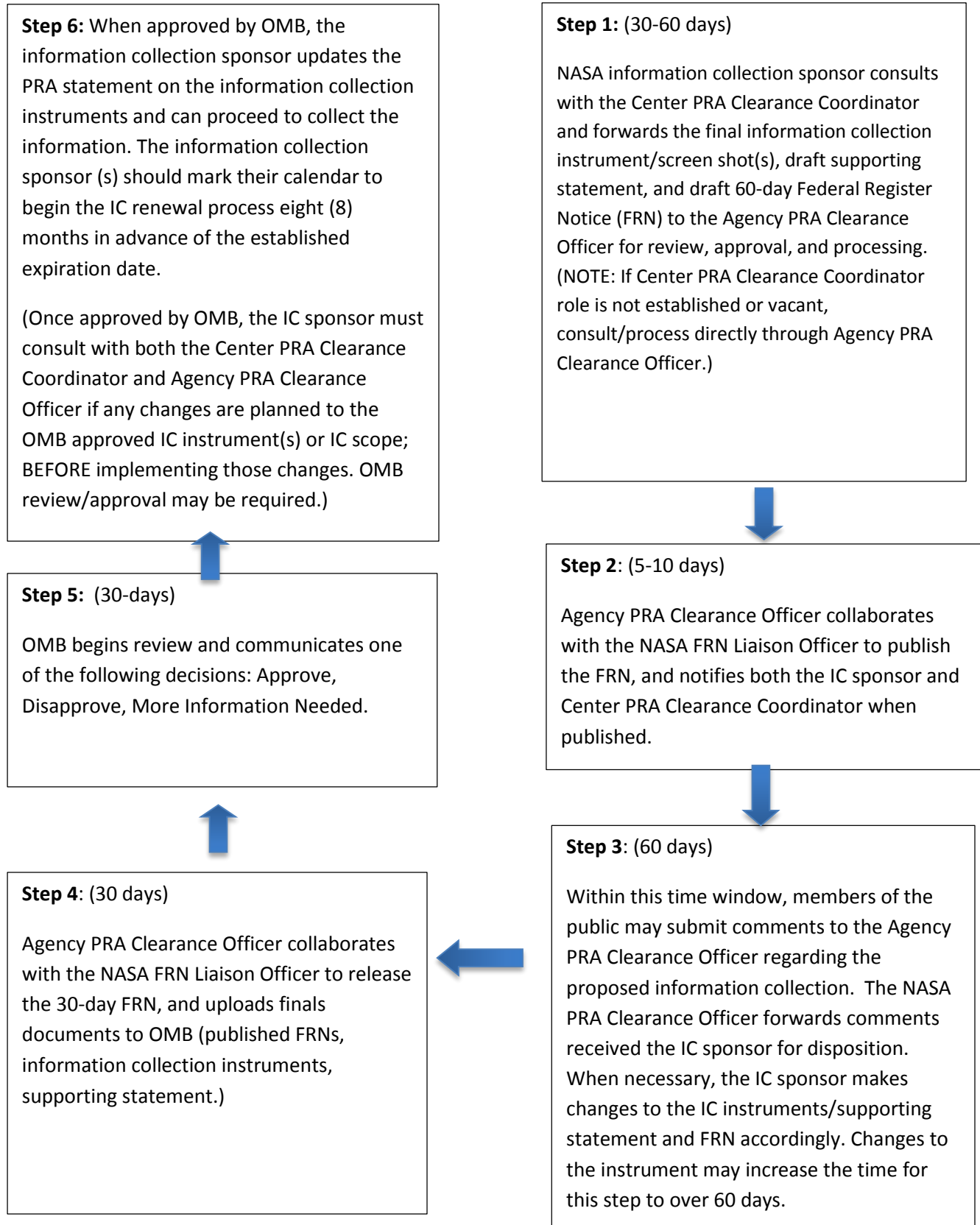
Nine Categories of Inquiry/Information Collection Which Generally Do Not Constitute Information/Trigger the PRA Inquiry (source: PRA of 1995)

- *Information* means any statement or estimate of fact or opinion, regardless of form or format, whether in numerical, graphic, or narrative form, and whether oral or maintained on paper, electronic or other media. “Information” does not generally include items in the following categories; however, OMB may determine that any specific item constitutes “information”:
 - (1) Affidavits, oaths, affirmations, certifications, receipts, changes of address, consents, or acknowledgments; provided that they entail no burden other than that necessary to identify the respondent, the date, the respondent's address, and the nature of the instrument
 - (2) Samples of products or of any other physical objects;
 - (3) Facts or opinions obtained through direct observation by an employee or agent of the sponsoring agency or through non-standardized oral communication in connection with such direct observations;
 - (4) Facts or opinions submitted in response to general solicitations of comments from the public, published in the FEDERAL REGISTER or other publications, regardless of the form or format thereof, provided that no person is required to supply specific information pertaining to the commenter, other than that necessary for self-identification, as a condition of the agency's full consideration of the comment;
 - (5) Facts or opinions obtained initially or in follow-on requests, from individuals (including individuals in control groups) under treatment or clinical examination in connection with research on or prophylaxis to prevent a clinical disorder, direct treatment of that disorder, or the interpretation of biological analyses of body fluids, tissues, or other specimens, or the identification or classification of such specimens;
 - (6) A request for facts or opinions addressed to a single person;
 - (7) Examinations designed to test the aptitude, abilities, or knowledge of the persons tested and the collection of information for identification or classification in connection with such examinations;
 - (8) Facts or opinions obtained or solicited at or in connection with public hearings or meetings;
 - (9) Facts or opinions obtained or solicited through non-standardized follow-up questions designed to clarify responses to approved collections of information.
- Collections of information that are generally **not** subject to the PRA
 - (a) OMB review is not required when NASA obtains or solicits information from nine or fewer members of the public by means of identical questions. However, the PRA requires such collections to include a statement indicating the request is not subject to the requirements of the PRA.

(b) OMB review is not required for collections of information:

- Conducting a Federal criminal investigation or prosecution;
- Disposing of a particular criminal matter
- Conducting a civil action to which the United States or any other official or agency thereof is a party; or
- Conducting an administrative action of investigation involving an agency against specific individuals or entities

**ATTACHMENT E: Process to Establish a New Information Collection (IC),
Extend an Expiring IC, or Reinstate a Cancelled IC (typically 6 months)**



ATTACHMENT F: Generic Clearance/OMB Short Form

This OMB form is used when NASA plans to collect information via the NASA Generic Clearance/OMB Control Number 2700-0153.

TITLE OF INFORMATION COLLECTION:

PURPOSE:

DESCRIPTION OF RESPONDENTS:

TYPE OF COLLECTION: (Check one)

- ☐ Customer Comment Card/Complaint Form
☐ Usability Testing (e.g., Website or Software)
☐ Focus Group

- ☐ Customer Satisfaction Survey
☐ Small Discussion Group
☐ Other: _____

CERTIFICATION:

I certify the following to be true:

1. The collection is voluntary.
2. The collection is low-burden for respondents and low-cost for the Federal Government.
3. The collection is non-controversial and does not raise issues of concern to other federal agencies.
4. The results are not intended to be disseminated to the public.
5. Information gathered will not be used for the purpose of substantially informing influential policy decisions.
6. The collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the future.

Name: _____

To assist review, please provide answers to the following question:

Personally Identifiable Information:

1. Is personally identifiable information (PII) collected? ☐ Yes ☐ No
2. If Yes, will any information that is collected be included in records that are subject to the Privacy Act of 1974? ☐ Yes ☐ No
3. If Yes, has an up-to-date System of Records Notice (SORN) been published? ☐ Yes ☐ No

Gifts or Payments:

Is an incentive (e.g., money or reimbursement of expenses, token of appreciation) provided to participants? ☐ Yes ☐ No

BURDEN HOURS

Category of Respondent	No. of Respondents	Participation Time	Burden
Totals			

FEDERAL COST: The estimated annual cost to the Federal government is _____

If you are conducting a focus group, survey, or plan to employ statistical methods, please provide answers to the following questions:

The selection of your targeted respondents

1. Do you have a customer list or something similar that defines the universe of potential respondents and do you have a sampling plan for selecting from this universe?
☐ Yes ☐ No

If the answer is yes, please provide a description of both below (or attach the sampling plan)? If the answer is no, please provide a description of how you plan to identify your potential group of respondents and how you will select them?

Administration of the Instrument

1. How will you collect the information? (Check all that apply)
 - ☐ Web-based or other forms of Social Media
 - ☐ Telephone
 - ☐ In-person
 - ☐ Mail
 - ☐ Other, Explain
2. Will interviewers or facilitators be used? ☐ Yes ☐ No

Please make sure that all instruments, instructions, and scripts are submitted with the request.

Instructions for completing Request for Approval under the “Generic Clearance for the Collection of Routine Customer Feedback”

TITLE OF INFORMATION COLLECTION: Provide the name of the collection that is the subject of the request. (for example: *NASA OCIO Customer Satisfaction Survey*)

PURPOSE: Provide a brief description of the purpose of this collection and how it will be used. If this is part of a larger study or effort, please include this in your explanation.

DESCRIPTION OF RESPONDENTS: Provide a brief description of the targeted group or groups for this collection of information. These groups must have experience with the program.

TYPE OF COLLECTION: Check one box. If you are requesting approval of other instruments under the generic, you must complete a form for each instrument.

CERTIFICATION: Please read the certification carefully. If you incorrectly certify, the collection will be returned as improperly submitted or it will be disapproved.

Personally Identifiable Information: Provide answers to the questions. Note: Agencies should only collect PII to the extent necessary, and they should only retain PII for the period of time that is necessary to achieve a specific objective.

Gifts or Payments: If you answer yes to the question, please describe the incentive and provide a justification for the amount.

BURDEN HOURS:

Category of Respondents: Identify who you expect the respondents to be in terms of the following categories: (1) Individuals or Households; (2) Private Sector; (3) State, local, or tribal governments; or (4) Federal Government. Only one type of respondent can be selected per row.

No. of Respondents: Provide an estimate of the Number of Respondents.

Participation Time: Provide an estimate of the amount of time (in minutes) required for a respondent to participate (e.g. fill out a survey or participate in a focus group)

Burden: Provide the Annual burden hours: Multiply the Number of Respondents and the Participation Time then divide by 60.

FEDERAL COST: Provide an estimate of the annual cost to the Federal government.

If you are conducting a focus group, survey, or plan to employ statistical methods, please provide answers to the following questions:

The selection of your targeted respondents. Please provide a description of how you plan to identify your potential group of respondents and how you will select them. If the answer is yes, to the first question, you may provide the sampling plan in an attachment.

Administration of the Instrument: Identify how the information will be collected. More than one box may be checked. Indicate whether there will be interviewers (e.g. for surveys) or facilitators (e.g., for focus groups) used.

Submit all instruments, instructions, and scripts are submitted with the request.

ATTACHMENT G:

Information Collection Authorization to Deploy/Release an Information Collection (IC) Instrument

NASA Form Number Pending

Title of Information Collection (IC): _____

Information Collection Point of Contact Name, Signature, and Organization Code:

This information collection is _____ conducted by NASA _____ sponsored by NASA.

Part I: The attached information collection was reviewed and does not trigger the PRA.

Center PRA Clearance Coordinator Name, Signature, Date: _____

Agency PRA Clearance Officer Name, Signature, Date: _____

Part II: The attached information collection was reviewed and determined to trigger the PRA.

OMB Control Number and Expiration Date: _____

This information collection will display the required PRA statement with the active OMB control number, as validated on www.reginfo.gov

IC Sponsor Name, Signature, Date: _____

Center PRA Clearance Coordinator Name, Signature, Date: _____

Agency PRA Clearance Officer Name, Signature, Date: _____

NOTE: The term 'sponsors' a collection is used when a federal agency (A) causes another federal agency to collect the information, or (B) contracts or enters into a cooperative agreement with a person to collect the information

ATTACHMENT H: References and Applicable Forms

- a. Privacy Act of 1974, 5 U.S.C. § 552a as amended
- b. NPD 1382.17, NASA Privacy Policy
- c. Information Collection Certification for Proposed Collections of Information, NASA form number pending
- d. Information Collection Authorization To Deploy/Release an Information Collection (IC) Instrument, NASA form number pending

End of NID Attachments